

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**MWK RECRUITING, INC.**

**Plaintiff**

**v.**

**EVAN P. JOWERS, YULIYA  
VINOKUROVA, ALEJANDRO VARGAS,  
and LEGIS VENTURES (HK) COMPANY  
LIMITED (aka Jowers / Vargas),**

**Defendants.**

**Civil Action No. 1:18-cv-00444**

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE RESPONSIVE PLEADING**

Defendant Evan P. Jowers (“**Jowers**”) requests that the Court extend his deadline under Fed. R. Civ. P. 12(a)(4)(A) to file an a responsive pleading to Monday, August 19, 2019.

1. On July 29, 2019, the Court issued an order granting in part and denying in part Defendants’ Motion to Dismiss [ECF Doc. No. 87]. The Court dismissed all claims against the non-Jowers defendants, leaving Jowers the only live defendant in this action. Under Fed. R. Civ. P. 12(a)(4)(A), Jowers has 14 days, or until Monday, August 12, 2019, to file a responsive pleading under the Federal Rules of Civil Procedure to Plaintiff MWK Recruiting, Inc.’s (“**MWK**”) Second Amended Complaint (the “**Complaint**”).

2. Given the need for Jowers’ counsel to attend depositions in New York and to prepare for a September 4–6, 2019 trial in the Delaware Court of Chancery, Jowers respectfully requests an additional 7 days in which to file a responsive pleading to the Complaint. This would extend the deadline to Monday, August 19, 2019. This extension is not being sought for purposes of delay, but so that justice may be done.

3. Counsel for Jowers has conferred with Ray Mort, counsel for MWK, and he has stated that MWK is not opposed the relief requested in this Motion.

Jowers respectfully requests that the Court extend the deadline under Fed. R. Civ. P. 12(a)(4)(A) to file a responsive pleading by 7 days, *i.e.*, through and including Monday, August 19, 2019. Jowers also requests all further relief to which he may be justly entitled.

Dated: August 9, 2019.

Respectfully submitted,

By: /s/ James C. Bookhout

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**COUNSEL FOR DEFENDANTS  
EVAN P. JOWERS AND LEGIS  
VENTURES (HK) COMPANY LIMITED**

**CERTIFICATE OF CONFERENCE**

I hereby certify that, on August 8, 2019, I conferred via email with Ray Mort, counsel for MWK Recruiting, Inc., regarding the subject matter of this Motion, and he stated that he was not opposed to the relief requested.

/s/ James C. Bookhout

James C. Bookhout

**CERTIFICATE OF SERVICE**

I hereby certify that, on August 9, 2019, a true and accurate copy of the foregoing document was served via the Court's CM/ECF facilities and via e-mail to all counsel of record.

/s/ James C. Bookhout

James C. Bookhout